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July 16, 2003

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
One South Station, Second Floor
Boston, MA 02110

Re: D.T.E. 01-20 Part A-B - Unbundled Network Elements

Dear Ms. Cottrell:

Enclosed please find an original and 10 copies of Verizon Massachusetts' ("Verizon MA") Compliance Filing in the above-referenced proceeding. This filing is made in accordance with the Department's Letter Order dated July 14, 2003. In this filing, Verizon MA has: (1) eliminated reference to hot cut options 1 and 2 in Part B, Section 2.5; (2) eliminated non-recurring rate elements for hot cut options 1 and 2 throughout Part M, Section 1; and (3) made a minor notation change in Part M, Section 2.5.1, Page 5 associated with the monthly Analog Two Wire link for the Suburban zone. Due to the number of pages in Part M, Section 1 revised in this filing, Verizon MA is attaching a complete Section 1 for the convenience of the Department and the parties.

In the current tariff, Verizon MA does not have discrete non-recurring hot cut charges but charges for hot cut loops using the same non-recurring rate elements as would apply to any other loop provisioned for a CLEC. Although the Department adopted Verizon MA's proposal in this case to establish discrete hot cut rates and actually set those rates, it denied Verizon MA the ability to charge those new rates until the Department completes an investigation of Verizon MA's WPTS process and its costs. Consistent with the manner in which Verizon MA currently charges for hot cuts, Verizon MA will apply the Department-approved non-recurring charges for loops to hot cuts, including service order, central office wiring, and provisioning rate elements, pending that investigation or until otherwise ordered by the Department.¹

¹

Verizon MA would note that the Department approved in this docket a new non-recurring rate structure for UNE loops that is substantially different from the existing structure. Because Verizon MA must change its billing systems to incorporate the rate-structure changes approved by the Department for non-recurring charges, it must apply the new rate structure for hot cuts. The billing system cannot accommodate both the new rate structure for non-recurring charges for new links and a separate rate structure for hot cuts.

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Finally, Verizon MA has made two revisions in Part M, Section 5.2 in response to an informal inquiry from Department Staff. In Section 5.2.1, the rate for the application fee for a subsequent arrangement is being revised from \$2,000 to \$2,500, while in Section 5.2.2, the rate for the engineering and administration fee for a subsequent arrangement is being revised from \$652.91 to \$152.91. Both these revised rates are consistent with the Part CA collocation cost study but were coded incorrectly in the rate comparison matrix and the compliance tariff previously filed.

Sincerely,

Bruce P. Beausejour

cc: Tina Chin, Esquire, Hearing Officer
Marcella Hickey, Esquire, Hearing Officer
Michael Isenberg, Esquire, Telecommunications Director
Service List